

PETER Y. LEE
ATTORNEY AT LAW

770 RIVER ROAD
P.O. BOX 52
EDGEWATER, NJ 07020

(212) 808-0716 TEL
(212) 808-0719 FAX
PETER.LEE@LEEADVOCATES.COM

January 26, 2021

Hon. Gabriel W. Gorenstein, U.S.M.J.
U.S. Courthouse
500 Pearl Street
New York, New York 10007

Re:
Sungjin Inc. Co., Ltd. vs. Itochu International Inc., et al.
S.D.N.Y. Civ. Action No. 1:19-cv-09496-GBD-GWG
Request to extend deadlines in scheduling order (ECF 99)

Dear Magistrate Judge Gorenstein:

On behalf of plaintiff, we respectfully request a 45-day extension of the existing deadlines set forth in the parties' joint scheduling order filed October 21, 2020 (ECF 99). The defendants consent to the relief requested.

In accordance with Paragraph 1.E. of the Court's individual practices, (1) we seek a 45-day extension of the dates set forth in the scheduling order at Paragraphs "3(e)" through "3(k)," and "7"; (2) this is the very first request for extension, by any party; and (3) we seek the extension because the Thanksgiving, Christmas and New Year's holidays (both here and for the parties abroad) following the scheduling order have greatly delayed the timely progress of discovery. To say the least, reaching the necessary client contacts overseas and coordinating with the appropriate decision makers has been challenging. Moreover, local Covid-19 conditions in Japan and South Korea are not always consistent with those in our tristate area, and certainly do not help move things expeditiously.

For the reasons stated, we respectfully request the Court to "so order" the following new deadlines:

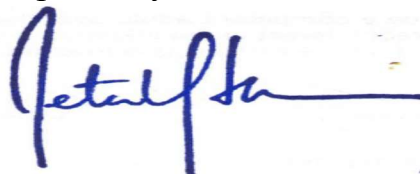
<u>ECF 99</u> at	<u>Description</u>	<u>New Deadline</u>
¶3(e)	Deadline for further interrogatories...	2/23/2021
¶3(f)	Request for leave to amend pleadings...	4/20/2021

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¶3(g)	Discovery completed by	4/20/2021
¶3(h)	Requests for admission due by	5/17/2021
¶3(j)	Notification about summary judgment by...	5/4/2021
¶3(k)	Pretrial/summary judgment motion by	6/3/2021
¶7	Parties discuss mediation by	March 2021

We thank Your Honor for the Court's valuable consideration.

Respectfully submitted,



PETER Y. LEE

PYL/ddh
cc: Victor Genecin, Esq.